

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

GOOGLE, INC.

PLAINTIFF

V.

CIVIL ACTION NO. 3:14-CV-981-HTW-LRA

JIM HOOD, in his official capacity
as Attorney General of the State of
Mississippi

DEFENDANT

ANSWER AND DEFENSES

Jim Hood, in his official capacity as Attorney General of the State of Mississippi (“Attorney General”), files his Answer and Defenses to the Complaint for Declaratory and Injunctive Relief (“Complaint”) [Doc. No. 1] filed by plaintiff, Google, Inc. (“Google”).

FIRST DEFENSE

The Complaint fails to state a claim upon which relief can be granted and should therefore be dismissed, in whole or in part, pursuant to Fed. R. Civ. P. 12(b)(6).

SECOND DEFENSE

The Complaint should be dismissed for lack of subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1).

THIRD DEFENSE

The Court should abstain under the *Younger* abstention doctrine.

FOURTH DEFENSE

Google's claims are not ripe for adjudication and should be dismissed.

FIFTH DEFENSE

Google is not entitled to preliminary relief sought in the Complaint.

SIXTH DEFENSE

Google is not entitled to immunity under the Communications Decency Act ("CDA") for its own acts.

SEVENTH DEFENSE

Google's claims are barred, in whole or in part, for lack of standing.

EIGHTH DEFENSE

Google failed to state a justiciable claim under the First Amendment of the United States Constitution.

NINETH DEFENSE

Google has no clearly established constitutional right pursuant to 42 U.S.C. § 1983 with respect to an alleged retaliatory investigation on the part of the Attorney General.

TENTH DEFENSE

Google failed to state a justiciable claim under the Fourth Amendment to the United States Constitution.

ELEVENTH DEFENSE

The facts not having been fully developed, the Attorney General affirmatively asserts all defenses pursuant to Fed. R. Civ. P. 8(c) and/or 12(b) which are available, or may become available through further discovery.

ANSWER

The Attorney General responds to the allegations of the Complaint, paragraph-by-paragraph, as follows:

1. Denied as stated. Paragraph 1 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 1 are denied.

2. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 2 speak for themselves. Any and all remaining allegations contained in paragraph 2 are denied.

3. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 3 speak for themselves. Any and all remaining allegations contained in paragraph 3 are denied.

4. Denied as stated. Paragraph 4 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 4 are denied.

5. Denied as stated. Paragraph 5 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 5 are denied.

6. Denied as stated. Paragraph 6 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 6 are denied.

7. Denied as stated. Paragraph 7 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 7 are denied.

8. Denied as stated. Paragraph 8 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 8 are denied.

9. Denied as stated. Paragraph 9 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 9 are denied.

10. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 10 speak for themselves. Any and all remaining allegations contained in paragraph 10 are denied.

11. The Attorney General is without sufficient knowledge or information to admit or deny the allegations in the first two sentences of paragraph 11. The allegations in the third sentence of paragraph 11 are denied as stated. The

Attorney General admits only that any documents referenced in, or used to generate the allegations in, the third sentence of paragraph 11 speak for themselves. Any and all remaining allegations contained in paragraph 11 are denied.

12. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 12 speak for themselves. Any and all remaining allegations contained in paragraph 12 are denied.

13. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 13 speak for themselves. Any and all remaining allegations contained in paragraph 13 are denied.

14. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 14 speak for themselves. Any and all remaining allegations contained in paragraph 14 are denied.

15. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 15 speak for themselves. Any and all remaining allegations contained in paragraph 15 are denied.

16. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 16 speak

for themselves. Any and all remaining allegations contained in paragraph 16 are denied.

17. Denied as stated. Paragraph 17 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 17 are denied.

18. Denied as stated. Paragraph 18 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 18 are denied.

19. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 19 speak for themselves. Any and all remaining allegations contained in paragraph 19 are denied.

20. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 20 speak for themselves. Any and all remaining allegations contained in paragraph 20 are denied.

21. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 21 speak for themselves. Any and all remaining allegations contained in paragraph 21 are denied.

22. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 22 speak

for themselves. Any and all remaining allegations contained in paragraph 22 are denied.

23. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 23 speak for themselves. Any and all remaining allegations contained in paragraph 23 are denied.

24. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 24 speak for themselves. Any and all remaining allegations contained in paragraph 24 are denied.

25. Denied as stated. Paragraph 25 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 25 are denied.

26. The allegations in the first sentence of paragraph 26 are denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, the first sentence of paragraph 26 speak for themselves. The allegations in the second sentence of paragraph 26 are denied as stated. The second sentence of paragraph 26 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard the allegations in the second sentence of paragraph 26 are denied.

27. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 27 speak for themselves. Any and all remaining allegations contained in paragraph 27 are denied.

28. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 28 speak for themselves. Any and all remaining allegations contained in paragraph 28 are denied.

29. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 29 speak for themselves. Any and all remaining allegations contained in paragraph 29 are denied.

30. The allegations in the first two sentences of paragraph 30 are denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, the first two sentences of paragraph 30 speak for themselves. The allegations in the third second sentence of paragraph 30 are denied as stated. The third second sentence of paragraph 30 state legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations in the third sentence of paragraph 30 are denied.

31. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 31 speak

for themselves. Any and all remaining allegations contained in paragraph 31 are denied.

32. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 32 speak for themselves. Any and all remaining allegations contained in paragraph 32 are denied.

33. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 33 speak for themselves. Any and all remaining allegations contained in paragraph 33 are denied.

34. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 34 speak for themselves. Any and all remaining allegations contained in paragraph 34 are denied.

35. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 35 speak for themselves. Any and all remaining allegations contained in paragraph 35 are denied.

36. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 36 speak for themselves. Any and all remaining allegations contained in paragraph 36 are denied.

37. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 37 speak for themselves. Any and all remaining allegations contained in paragraph 37 are denied.

38. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 38 speak for themselves. Any and all remaining allegations contained in paragraph 38 are denied.

39. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 39 speak for themselves. Any and all remaining allegations contained in paragraph 39 are denied.

40. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 40 speak for themselves. Any and all remaining allegations contained in paragraph 40 are denied.

41. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 41 speak for themselves. Any and all remaining allegations contained in paragraph 41 are denied.

42. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 42 speak

for themselves. Any and all remaining allegations contained in paragraph 42 are denied.

43. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 43 speak for themselves. Any and all remaining allegations contained in paragraph 43 are denied.

44. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 44 speak for themselves. Any and all remaining allegations contained in paragraph 44 are denied.

45. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 45 speak for themselves. Any and all remaining allegations contained in paragraph 45 are denied.

46. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 46 speak for themselves. Any and all remaining allegations contained in paragraph 46 are denied.

47. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 47 speak for themselves. Any and all remaining allegations contained in paragraph 47 are denied.

48. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 48 speak for themselves. Any and all remaining allegations contained in paragraph 48 are denied.

49. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 49 speak for themselves. Any and all remaining allegations contained in paragraph 49 are denied.

50. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 50 speak for themselves. Any and all remaining allegations contained in paragraph 50 are denied.

51. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 51 speak for themselves. Any and all remaining allegations contained in paragraph 51 are denied.

52. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 52 speak for themselves. Any and all remaining allegations contained in paragraph 52 are denied.

53. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 53 speak

for themselves. Any and all remaining allegations contained in paragraph 53 are denied.

54. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 54 speak for themselves. Any and all remaining allegations contained in paragraph 54 are denied.

55. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 55 speak for themselves. Any and all remaining allegations contained in paragraph 55 are denied.

56. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 56 speak for themselves. Any and all remaining allegations contained in paragraph 56 are denied.

57. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 57 speak for themselves. Any and all remaining allegations contained in paragraph 57 are denied.

58. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 58 speak for themselves. Any and all remaining allegations contained in paragraph 58 are denied.

59. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 59 speak for themselves. Any and all remaining allegations contained in paragraph 59 are denied.

60. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 60 speak for themselves. Any and all remaining allegations contained in paragraph 60 are denied.

61. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 61 speak for themselves. Any and all remaining allegations contained in paragraph 61 are denied.

62. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 62 speak for themselves. Any and all remaining allegations contained in paragraph 62 are denied.

63. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 63 speak for themselves. Any and all remaining allegations contained in paragraph 63 are denied.

64. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 64 speak

for themselves. Any and all remaining allegations contained in paragraph 64 are denied.

65. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 65 speak for themselves. Any and all remaining allegations contained in paragraph 65 are denied.

66. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 66 speak for themselves. Any and all remaining allegations contained in paragraph 66 are denied.

67. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 67 speak for themselves. Any and all remaining allegations contained in paragraph 67 are denied.

68. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 68 speak for themselves. The last sentence in paragraph 68 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in the last sentence of paragraph 68 are denied. Any and all remaining allegations contained in paragraph 68 are denied.

69. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 69 speak for themselves. Any and all remaining allegations contained in paragraph 69 are denied.

70. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 70 speak for themselves. Any and all remaining allegations contained in paragraph 70 are denied.

71. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 71 speak for themselves. Any and all remaining allegations contained in paragraph 71 are denied.

72. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 72 speak for themselves. Any and all remaining allegations contained in paragraph 72 are denied.

73. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 73 speak for themselves. Any and all remaining allegations contained in paragraph 73 are denied.

74. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 74 speak

for themselves. Any and all remaining allegations contained in paragraph 74 are denied.

75. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 75 speak for themselves. Any and all remaining allegations contained in paragraph 75 are denied.

76. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 76 speak for themselves. Any and all remaining allegations contained in paragraph 76 are denied.

77. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 77 speak for themselves. Any and all remaining allegations contained in paragraph 77 are denied.

78. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 78 speak for themselves. Any and all remaining allegations contained in paragraph 78 are denied.

79. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 79 speak for themselves. Any and all remaining allegations contained in paragraph 79 are denied.

80. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 80 speak for themselves. Any and all remaining allegations contained in paragraph 80 are denied.

81. Denied as stated. The Attorney General admits only that any documents referenced in, or used to generate the allegations in, paragraph 81 speak for themselves. Any and all remaining allegations contained in paragraph 81 are denied.

82. Denied as stated. Paragraph 82 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 82 are denied.

83. Denied as stated. Paragraph 83 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 83 are denied.

84. Denied as stated. Paragraph 84 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 84 are denied.

85. The Attorney General readopts and realleges the answers in paragraphs 1-84 as if set forth fully herein.

86. Denied as stated. Paragraph 86 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 86 are denied.

87. Denied as stated. Paragraph 87 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 87 are denied.

88. Denied as stated. Paragraph 88 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 88 are denied.

89. Denied as stated. Paragraph 89 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 89 are denied.

90. Denied as stated. Paragraph 90 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 90 are denied.

91. Denied as stated. Paragraph 91 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 91 are denied.

92. Denied as stated. Paragraph 92 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 92 are denied.

93. The Attorney General readopts and realleges the answers in paragraphs 1-92 as if set forth fully herein.

94. Denied as stated. Paragraph 94 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 94 are denied.

95. Denied as stated. Paragraph 95 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 95 are denied.

96. Denied as stated. Paragraph 96 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 96 are denied.

97. Denied as stated. Paragraph 97 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 97 are denied.

98. Denied as stated. Paragraph 98 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 98 are denied.

99. Denied as stated. Paragraph 99 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 99 are denied.

100. Denied as stated. Paragraph 100 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 100 are denied.

101. The Attorney General readopts and realleges the answers in paragraphs 1-100 as if set forth fully herein.

102. Denied as stated. Paragraph 102 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 102 are denied.

103. Denied as stated. Paragraph 103 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 103 are denied.

104. The Attorney General readopts and realleges the answers in paragraphs 1-103 as if set forth fully herein.

105. Denied as stated. Paragraph 105 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 105 are denied.

106. The Attorney General readopts and realleges the answers in paragraphs 1-105 as if set forth fully herein.

107. Denied as stated. Paragraph 107 states legal conclusions that do not require a response from the Attorney General and if the Attorney General is mistaken in that regard, the allegations contained in paragraph 107 are denied.

The allegations in the unnumbered paragraph titled “**PRAYER FOR RELIEF**,” including subparagraphs (A) through (E), are denied as stated. The allegations in subparagraphs (A) through (E) of the untitled paragraph state legal conclusions that do not require a response from the Attorney General and if the

Attorney General is mistaken in that regard, the allegations contained in subparagraphs (A) through (E) are denied.

The Attorney General denies that Google is entitled to any relief set out in the Complaint. All allegations heretofore neither expressly admitted nor denied are now denied.

THIS the 10th day of April, 2015.

Respectfully Submitted,

JIM HOOD, in his official capacity as
Attorney General of the State of
Mississippi

By: JIM HOOD, ATTORNEY GENERAL,
STATE OF MISSISSIPPI

By: /s/ Douglas T. Miracle
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CERTIFICATE OF SERVICE

I, Douglas T. Miracle, Special Assistant Attorney General for the State of Mississippi, hereby certify that a true and correct copy of the foregoing document has been filed electronically with the Clerk of Court using the Court's ECF system and thereby served on all counsel of record having entered their appearance in this action:

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THIS the 10th day of April, 2015.

/s/ Douglas T. Miracle
DOUGLAS T. MIRACLE